

June 6, 2006

Bobby Garcia
Permitting and Enforcement Division
California Integrated Waste Management Board
1001 I Street MS-16
Sacramento, Ca. 95812-4025

SUBJECT: California Conference of Directors of Environmental Health (CCDEH) Comments on Proposed Permit Implementation (AB 1497) Regulations.

Dear Ms Garcia:

CCDEH wishes to submit the following comments for the record during the 60-day comment period for the abovereferenced proposed rule:

1. We commend CIWMB staff for the extensive outreach and communication with various parties regarding this proposed rule.
2. In general, we support the staff recommendations as embodied in the draft regulations submitted for public comment.
3. Our members concur with the Bay Area Roundtable, City of San Diego and several other individual Local Enforcement Agencies (LEAs) in their support of the "Decision Tree" as a process to identify whether a change in design, or new facility qualifies as an RFI amendment, Modified permit, Revised permit, or new permit. (Title 14, Section 21620(2,3,4)).
4. We strongly support an EA override mechanism such as envisioned in Section 21620(a)(1)(E) should a Minor Change List be included in the regulations. This provision will maintain the essential element of local control in the facility permit process.

Bobby Garcia
Permit Implementation Regulations

Page 2

5. The requirement of postings or notices for RFI amendments found in Title 27, Section 21660 is not warranted and should be deleted.
6. We also urge your Board to restrict the requirement for informational hearings to full solid waste facility permits – and not standardized or registration permits.

CCDEH appreciates the opportunity to comment on these proposed regulations and is available to discuss the comments in this letter with Board members and staff. Please feel free to contact me at (408) 918-1955 or Justin Malan, CCDEH Executive Director at (916) 944-7315 if you or your staff have any questions regarding this letter.

Sincerely,

signed

Ben Gale
CCDEH Solid Waste Policy Chair

CC: CCDEH Executive Committee
Enforcement Advisory Council Members